

JUDGE KOELT

08 CV 7357

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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LAURA LIM,

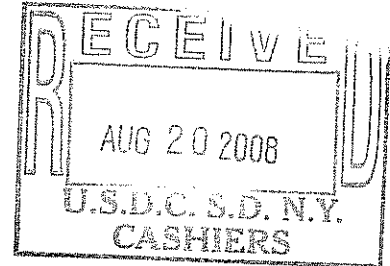
Plaintiff,

-against-

ROYAL CARIBBEAN CRUISES, LTD.,
ADVENTURE OF THE SEAS, INC., and
ROYAL CARIBBEAN INTERNATIONAL,

Defendants.

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**PLAINTIFF DEMANDS
A TRIAL BY JURY**

COMPLAINT

**SEAMAN'S CASE UNDER
THE JONES ACT FOR
PERSONAL INJURIES**

**SUITS UNDER SPECIAL RULE FOR SEAMEN TO
SUE WITHOUT SECURITY OR PREPAYMENT OF
FEES FOR THE ENFORCEMENT OF THE LAWS
OF THE UNITED STATES, COMMON AND STAT-
UTORY FOR THE PROTECTION OF AND FOR
THE HEALTH AND SAFETY OF SEAMEN AT SEA**

Plaintiff LAURA LIM, by her attorneys FRIEDMAN, JAMES &
BUCHSBAUM LLP, complaining of the defendants ROYAL CARIBBEAN CRUISES,
LTD. ("RCC"), ADVENTURE OF THE SEAS, INC. ("ADVENTURE"), and ROYAL

CARIBBEAN INTERNATIONAL ("RCI"), respectfully alleges upon information and belief as follows:

FIRST COUNT

1. At all times hereinafter mentioned, defendants were and still are corporations, or other business organizations, organized and existing under and by virtue of the laws of one of the States of the United States of America, other than the State of New York, and were doing and transacting business within this district.

2. At all times and dates hereinafter mentioned, defendants owned the M/V ADVENTURE OF THE SEAS.

3. At all times and dates hereinafter mentioned, defendants were the owners *pro hac vice* of the M/V ADVENTURE OF THE SEAS.

4. At all times and dates hereinafter mentioned, defendants operated the M/V ADVENTURE OF THE SEAS.

5. At all times and dates hereinafter mentioned, defendants managed the M/V ADVENTURE OF THE SEAS.

6. At all times and dates hereinafter mentioned, defendants controlled the M/V ADVENTURE OF THE SEAS.

7. At all times and dates hereinafter mentioned, the plaintiff was a member of the crew of the M/V ADVENTURE OF THE SEAS and an employee of defendants.

8. On or about February 23, 2007, without any fault on the part of the plaintiff, and wholly and solely by reason of the negligence, carelessness and recklessness and of the defendants, its and their agents, servants and/or employees,

and by reason of the unseaworthiness of the M/V ADVENTURE OF THE SEAS, plaintiff was caused to sustain injuries.

9. As a result of the foregoing, the plaintiff was rendered sick, sore, lame and disabled and sustained severe permanent personal injuries, was and is internally and externally disabled causing her to suffer pain, and for a time she was prevented from attending to her daily labors, thereby losing sums of money which she otherwise would have earned as wages, and has endeavored to be cured of her injuries, and has expended sums of money to maintain herself, and will continue to endure pain and suffering, all to her damage.

10. By reason of the foregoing, plaintiff has been damaged in the sum of FIVE HUNDRED THOUSAND (\$500,000.00) DOLLARS.

SECOND COUNT

10. Plaintiff repeats and realleges each and every allegation of the First Count in this Complaint as if fully set forth at length herein.

11. Plaintiff is entitled to maintenance, cure, and medical expenses for the period that she was disabled and unable to work in the total sum of FIFTY THOUSAND (\$50,000.00) DOLLARS.

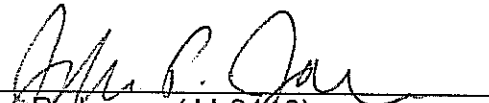
WHEREFORE, plaintiff LAURA LIM demands judgment against defendants ROYAL CARIBBEAN CRUISES, LTD., ADVENTURE OF THE SEAS, INC., and ROYAL CARIBBEAN INTERNATIONAL in the First Count in the sum of

FIVE HUNDRED THOUSAND (\$500,000.00) DOLLARS; and in the Second Count in the sum of FIFTY THOUSAND (\$50,000.00) DOLLARS; together with interest and costs.

Dated: New York, New York
August 20, 2008

FRIEDMAN, JAMES & BUCHSBAUM LLP
Attorneys for Plaintiff

By:


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